

TRUJILLO RODRIGUEZ & RICHARDS, LLC

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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PATRICK BRADY, et al.,	:	Civil Action No. 02-2917 (JEI)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
AIR LINE PILOTS ASSOCIATION,	:	
INTERNATIONAL,	:	
	:	
Defendant.	:	

PLAINTIFFS' NOTICE OF MOTION TO COMPEL DISCOVERY

TO: Jay Cohen, Esq.	John C. Connell, Esq.
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PLEASE TAKE NOTICE that on July 15, 2013, Plaintiffs shall move before the United States District Court, District of New Jersey, Mitchell H. Cohen U.S. Courthouse, One John F. Gerry Plaza, Fourth and Cooper Streets, Camden, New Jersey, for an Order Granting Plaintiffs'

Motion to Compel Discovery from ALPA related to the union dues collected by ALPA from the former TWA Pilots for the period January 9, 2001 through April 3, 2002.

In support of this motion, Plaintiffs will rely upon the accompanying Memorandum and Declaration of Nicole M. Acchione with Exhibits A-G. A proposed Form of Order is enclosed.

Oral Argument is requested if opposed.

Dated: June 14, 2013

Respectfully submitted,

TRUJILLO RODRIGUEZ & RICHARDS, LLC

By: s/ Lisa J. Rodriguez

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